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10 Attorney for Plaintiffs

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13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE  
15 NORTHERN MARIANA ISLANDS

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18 LI YING HUA, LI ZHENG ZHE and XU JING JI, ) CASE NO. CV 05-0019  
19 Plaintiffs, )  
20 vs. ) MOTION FOR SUMMARY  
21 JUNG JIN CORPORATION, a CNMI corporation, ) JUDGMENT AGAINST KSK  
22 ASIA ENTERPRISES, INC., a CNMI corporation, ) CORPORATION AND KIM KI SUNG  
23 PARK HWA SUN, KIM HANG KWON, )  
24 KSK CORPORATION, a CNMI corporation, and )  
25 KIM KI SUNG, ) Date: Thursday, July 17, 2008  
26 Defendants. ) Time: 8:30 a.m.  
27 ) Judge: Hon. Alex R. Munson, Chief Judge

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18 COMES NOW the Plaintiffs, by and through their attorney, with a motion pursuant to Fed.  
19 R. Civ. P. 56 for summary judgment against Defendants KSK CORPORATION and KIM KI SUNG  
20 for the claims of successor liability and fraudulent conveyance contained in Plaintiffs' Second  
21 Amended Verified Complaint filed in this matter on October 12, 2007.

22 This motion is supported by the pleadings, deposition, discovery and other records in this  
23 matter, by the declarations submitted herewith, by the Memorandum in Support thereof, and by the  
24 Proposed Findings of Uncontroverted Fact submitted concurrently herewith.

25 For the reasons stated below, Plaintiffs respectfully request that the Court find that there are  
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1 no genuine issues of material fact for trial and grant Plaintiffs judgment against KSK and KIM  
2 holding them jointly and severally liable for the unsatisfied portion of the August 24, 2006 Judgment  
3 against the four other defendants in this action, in addition to statutory attorney's fees and costs.

4 Alternatively, Plaintiffs request that the Court find the conveyance of the assets between the  
5 defendants fraudulent and in hindrance of Plaintiffs' redress for their wage and contract claims  
6 against four of the defendants hereto. Plaintiffs respectfully request that the Court void the  
7 fraudulent conveyances and return the transferred property into the hands of the original defendants  
8 to this action and back within the reach of Plaintiffs for satisfaction of a portion of the Judgment  
9 against the four original defendants hereto.

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Respectfully submitted this 19<sup>th</sup> day of June, 2008.

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/s/ Mark B. Hanson

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MARK B. HANSON

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19 Attorney for Plaintiffs

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1 CERTIFICATE OF SERVICE

2 I hereby certify that a copy of the foregoing will be deposited in the United States Post Office,  
3 first class mail, postage prepaid, addressed to the following:

4  
5 Jung Jin Corporation  
P.O. Box 503428  
6 Saipan, MP 96950  
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Park Hwa Sun  
P.O. Box 503428  
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7 Asia Enterprises Inc.  
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8 Saipan, MP 96950  
9 (670) 235-4321

Kim Hang Kwon  
P.O. Box 503448  
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10 I further certify that the following were served with a copy of the foregoing via the Court's  
11 electronic case filing system and via e-mail:

12  
13 G. Anthony Long, Esq.  
14 LAW OFFICE OF G. ANTHONY LONG  
P.O. Box 504970  
15 Saipan, Mariana Islands 96950  
E-mail: [gal@nmilaw.com](mailto:gal@nmilaw.com)

16  
17 DATED: June 19, 2008

/s/ Mark B. Hanson  
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MARK B. HANSON